

1 THE HONORABLE ROBERT S. LASNIK
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 OSURE BROWN, on his own behalf and
10 on behalf of other similarly situated
11 persons,

12 Plaintiff,

13 v.

14 TRANSWORLD SYSTEMS, INC., *et al.*,

15 Defendants.

16 No. 2:20-cv-00669-RSL

17 STIPULATION AND [PROPOSED]
18 ORDER REGARDING STAY OF
19 DISCOVERY

20 NOTE ON MOTION CALENDAR:

21 January 19, 2021

22 **STIPULATION**

23 Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiff Osure Brown (“Plaintiff”) and
24 Defendants Transworld Systems Inc. (“TSI”), Patenaude & Felix, APC (“P&F”), U.S. Bank
25 National Association (“U.S. Bank”), National Collegiate Student Loan Trust 2004-1, National
26 Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National
Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National
Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National
Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2
(collectively, “the Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”), hereby
stipulate and agree to stay discovery, including responses to outstanding Requests for Production
and Notices of Deposition, until 30 days after the Court rules on the defendants’ pending

1 Motions to Dismiss filed on August 6, 2020 and noted for hearing on October 16, 2020¹. The
2 parties have further agreed that if the Court denies any defendant's motion to dismiss in whole or
3 in part and taking into account the Court's ruling:

4 1. Any remaining parties agree to jointly or separately meet and confer within 10
5 days of the Court's ruling to determine available dates and confer concerning any objections or
6 other issues related to the Notices of Deposition served on or before January 12, 2021; and

7 2. Without waiving any objections to specific Requests for Production and any
8 subsequent meet and confer, defendants agree to make good faith efforts to produce responses
9 and document production within 30 days of the Court's ruling on Requests for Production served
10 on or before January 12, 2021.

11 The parties have entered into this stipulation and agreement to mutually cooperate in the
12 management of this action. Nothing in this agreement concerning discovery waives any
13 objections that the Parties may have to such discovery or any party's ability to make rolling
14 document productions.

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¹ See Dkt. Nos. 62, 65, 68, 69, 71 and 77.

1 DATED: January 19, 2021.

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14 Collegiate Student Loan Trust 2005-2,
15 National Collegiate Student Loan Trust 2005-
16 3, National Collegiate Student Loan Trust
17 2006-1, National Collegiate Student Loan
18 Trust 2006-2, National Collegiate Student
19 Loan Trust 2007-1, National Collegiate
20 Student Loan Trust 2007-2

[PROPOSED] ORDER

IT IS SO ORDERED.

Discovery in this matter is stayed, including responses to outstanding Requests for Production and Notices of Deposition, until 30 days after the Court rules on the defendants' pending motions to dismiss. If the Court denies any of defendant's motion to dismiss in whole or in part and taking into account the Court's ruling:

1. The parties shall jointly or separately meet and confer within 10 days of the Court's ruling to determine available dates and confer concerning any objections or other issues related to the Notices of Deposition served on or before January 12, 2021; and

2. Without waiving any objections to specific Requests for Production and any subsequent meet and confer, defendants shall make good faith efforts to produce responses and document production within 30 days of the Court's ruling on Requests for Production served on or before January 12, 2021.

DATED this _____ day of January, 2021.

Honorable Robert S. Lasnik